



August 5th, 2025

NYSDEC
Attn: Deer Hunting Regulations

625 Broadway
Albany NY 12233-4754

wildliferegs@dec.ny.gov

Subject: e-tags and DMAP

The New York Forest Owners Association (NYFOA) supports proposed regulation changes to 6 NYCRR Parts 1.18, 1.30 and 180.10 as described in the DEC Fish and Wildlife Regulatory Revisions. Of particular interest to NYFOA are the enhancements to the Deer Management Assistance Program (DMAP) that extends the permit renewal cycle from 3 years to 5 years and rescinds the limit on number of DMAP tags that may be used per hunter. In addition, the youth license proposal, intended to encourage a new generation of hunters by granting successful youth hunters the opportunity to harvest an additional animal is a good addition. Rescinding the limit on the number of DMAP tags that a single hunter can utilize, should increase the overall yield from the DMAP program by making sure the antlerless tags go to serious and successful hunters.

Management of deer in New York State is a critical issue across urban, suburban, and rural areas. An overabundance of deer is affecting agricultural crops from grains to grapes to Christmas trees and threatening regeneration of our important forests and woodlands. Deer prefer to eat tree species most desirable for producing future timber crops such as oak, maple, cherry, and others. They also limit regeneration needed to produce young successional forests to support a variety of wildlife. Invasive species are not favored by deer. When landowners take steps to eradicate or otherwise control invasive species and release important native species, their efforts can be literally “eaten away” by deer browsing.

Forests and woodlands cover 18.5 million acres of New York’s land and 75% of those lands are privately owned in 700,000 separate ownerships with 200,000 owners holding more than 10 acres of forest or woodland. Various management techniques are being used to limit deer damage. Fencing is being used for small, contained areas on some farms and Christmas tree plantations, but are cost-prohibitive across large areas. Larger Christmas tree and extensive timber harvest operations must depend on the DMAP program to control deer damage. Creation of “walls” of slash and other debris in timber harvests can also be constructed in small areas. These are cost-prohibitive for large operations. Increasing hunter access and ability to harvest deer sustainably by increasing the number of DMAP tags per hunter is an important step in further limiting the overpopulation of deer in certain areas.

Importantly, as noted in the Regulatory Impact Statement: *The total number of tags issued to each property with a DMAP permit would continue to be determined by the Department based on deer management objectives and site characteristics; however, the proposal would allow an individual hunter to use an unlimited number of the DMAP tags issued to a landowner. Landowners would benefit if their most successful hunters could continue to be successful.* These provisions are important for the program to be effective.

We understand the need for timely and accurate reporting of a harvest within 48 hours. However, some remote locations across the State do not have reliable cell phone coverage, or hunters choose to “stay in camp” for several days. Hopefully this will not deter hunters from following the new time limits.

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Although not addressed in the current proposed regulations, we recommend the DEC consider reducing the minimum acreage to apply for DMAP permits from 50 to 25. This change might entice more woodlot owners to apply for permits, especially in those areas where overabundance of deer is a major problem. Another suggestion is to award a "Preference Point" against the allocation of regular antlerless Deer Management Permits (DMP) to hunters who reported success in filling their DMP tag during the previous season. Again, this change should increase the yield from the regular DMP program, as well as increasing reporting compliance.

The New York Forest Owners Association promotes sustainable forestry practices and improved stewardship on privately owned woodlands in New York State. Through local chapter and statewide activities such as woods walks and tours, the bi-monthly New York Forest Owner magazine, and affiliation with other organizations with similar objectives, we help woodland owners to achieve their management objectives for their properties. Improving the DMAP program along with other provisions contained in the proposed regulation changes will improve the ability of hunters to obtain permits, improve reporting of harvests, and make the DEC program of deer management more efficient and successful.

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